

AO 91 (Rev. 11/11) Criminal Complaint

AUSA: Susan E. Fairchild
Agent: ☒ Jason E. Ebenhack

Telephone: (313) 226-9577
Telephone: (810) 989-5056

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America
v.

Alfredo Henriques RIBEIRO Ferreira

Case No.

Case: 2:23-mj-30009
Assigned To : Unassigned
Assign. Date : 1/11/2023
Description: COMP USA V. RIBEIRO
FERREIRA (KB)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 10, 2023 in the county of St. Clair in the
Eastern District of Michigan, the defendant(s) violated:

Code Section
Title 8, United States Code, Section 1325(a)

Offense Description
Improper Entry by Alien

This criminal complaint is based on these facts:

On or about January 10, 2023, in the Eastern District of Michigan, Southern Division, Alfredo Henriques RIBEIRO Ferreira, an alien from Brazil entered or attempted to enter the United States at a time or place other than as designated by immigration officers; in violation of Title 8, United States Code, Section 1325.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: 01/11/23

City and state: Detroit, Michigan


Complainant's signature

Jason E. Ebenhack, Border Patrol Agent
Printed name and title


Judge's signature

Jonathan J.C. Grey, U.S. Magistrate Judge
Printed name and title

AFFIDAVIT

I, Jason E. Ebenhack, declare the following under penalty of perjury:

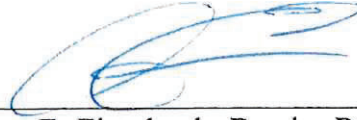
1. I am a Border Patrol Agent with the United States Department of Homeland Security, United States Border Patrol. I have been employed in this capacity since August 20, 2001. Currently, I am assigned to the Marysville Border Patrol Station. The facts set forth herein are based upon my personal knowledge as well as information provided by other law enforcement officers to include Border Patrol Agents and record checks of law enforcement databases. I have reviewed all information available relating to Alfredo Henriques RIBEIRO Ferreira, which attests to the following:
2. Alfredo Henriques RIBEIRO Ferreira is an eighty-two-year-old male, native and Citizen of Brazil. Alfredo Henriques RIBEIRO Ferreira claims to have last entered the United States at or near an Algonac, MI on January 10, 2023, without being admitted, inspected or paroled by an Immigration Officer.
3. On January 10, 2023, at approximately 6:40 AM, Border Patrol agents of the Marysville, Michigan station using a Mobile Video Surveillance System (MVSS) observed a vessel crossing the St. Clair River from Canada with three persons on board. The boat was observed traveling without navigation lights across the international border into the United States in Algonac, St. Clair County, Michigan. The boat then approached the shoreline in Algonac, Michigan. Agents conducting plain clothes surveillance in the area heard a boat approach and then depart the seawall behind a house that they had been surveilling. The address of this house is 1516 St. Clair River Drive.
4. After the boat departed, agents observed movement in the house through the bay window, observed the sliding door open, and saw lights turn on in the house. Due to the lack of light between the house, the yard, and the river, agents were unable to confirm if individuals got on or off the vessel before it departed. However, based on where the agents were positioned while conducting surveillance, they would have observed if any subjects had walked anywhere besides into the house at 1516 St. Clair River Drive or on to the vessel. The agent operating the MVSS, did not observe any subjects outside of the area of the house at 1516 St. Clair River Drive, and would

have observed them if they had walked south or west from the house. Detroit Sector RVSS operators observed the vessel enter the Chematogen Canal on the Canadian side at approximately 6:30 a.m. Agents maintained surveillance of the residence.

5. At approximately 8:50 AM, I observed a dark colored KIA Forte bearing Michigan license plate ECT3121 enter the driveway of 1516 St. Clair River Drive and proceed to park near the garage. A male subject exited the KIA and entered the home. Approximately five minutes later, the same male exited the house and entered the driver's side of the KIA, followed by a male who entered the passenger side of the KIA. The KIA reversed, turned around in the driveway, and processed to drive toward St. Clair River Drive.
6. Border Patrol Agent James Rentzel and I drove toward the KIA in the driveway. Agent Rentzel activated the emergency lights on his vehicle and the KIA came to a stop. Agent Rentzel and I approached the subjects, and through our investigation/interview/records it was determined that Alfredo Henriques RIBEIRO Ferreira was found to be a citizen of Brazil, present in the United States without having been admitted or paroled, having just entered the United States illegally. Alfredo Henriques RIBEIRO Ferreira presented me with a valid passport in his name issued by Brazil. The passport had no indication of any type of legal entry into the United States.
7. Based on the above information, I believe there is probable cause to conclude that Alfredo Henriques RIBEIRO Ferreira, is an alien who was found in the United States without the express permission from the Attorney General of the United States or from the Secretary of the Department of Homeland Security to re-apply for admission into the United States in violation of Title 8, United

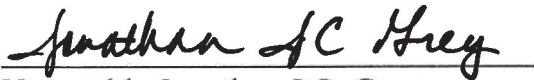
1/11/23

States Code, Section 1325(a).



Jason E. Ebenhack, Border Patrol Agent
U.S. Department of Homeland Security

Sworn to before me and signed in my
presence and/or by reliable electronic means.



Honorable Jonathan J.C. Grey
United States Magistrate Judge

Date: January 11, 2023